

Comments on RM-11306

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I want to register my OPPOSITION to RM-11306, which seeks to re-define Amateur sub-bands base on maximum bandwidth rather than the present emission mode-defined sub-bands. I am primarily opposed to the RM because (1) double-sideband with carrier ("AM") phone has been made an exception to the proposed bandwidth rules, rather than being accommodated within the basic framework of the proposal, (2) the definition of a definite limit on the bandwidths of the various modes of communication employed by the amateur, in place of the more flexible "sound engineering practice" philosophy presently in place, and (3) such micro-management of the amateur allocations is unnecessary.

- (1) Treating double-sideband-with-carrier ("AM") phone as an exception is troublesome because:
 - a. It implies that AM is getting special treatment, which may fuel further animosity in the (thankfully small) group of radio amateurs with anti-AM sentiments. It could also give this group an advantage in attempts to eliminate or impose further restrictions on AM in future rule-making proceedings.
 - b. Exceptions are too easily ignored, and eliminated, in any future revisions of the Part 97 rules.
- (2) Regarding strictly-defined limits on bandwidth, which is inherent in RM-11306. Specific limits on bandwidth discourage technical experimentation, which is contrary to key elements of the "Basis and Purpose of Amateur Radio" stated in Section 97.1 of the Commission's rules, namely "continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art," "encouragement and improvement of the amateur service through rules which provide for advancing skills in both communications AND TECHNICAL phases of the art"(emphasis added), and "expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronic experts." A stringent bandwidth requirement discourages equipment construction or modification by raising the concern that the resulting equipment may not be compliant with the bandwidth specification. The bandwidth limits that would be imposed on all modes are poorly defined (bandwidth at how many decibels less than the signal intensity at the center frequency?), and the need to perform an unambiguous measurement thereof (to verify compliance) which, under the current rules is unnecessary, and would place an undue burden on the radio amateur.
- (3) The American amateur allocations are over-regulated presently in the definition of sub-bands by mode, and RM-11306 would merely

substitute over-regulation in sub-band definition by bandwidth. Other countries have not found it necessary to micro-manage their amateur allocations to this extent, and neither has the United States in the case of the 160M band. I would respect and support the segmentation of amateur bands proposed in RM-11306 as a good VOLUNTARY bandplan, but not as something that needs to be outlined in Part 97 and enforced by law. I would encourage the FCC to adopt a philosophy that limits Part 97 regulations to those required to ensure freedom of interference to other services, but to otherwise allow the Amateur Service to manage its own affairs with mechanisms such as voluntary bandplans, gentlemen's agreements, and healthy doses of common courtesy and common sense.

In conclusion, I am opposed to RM-11306.

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